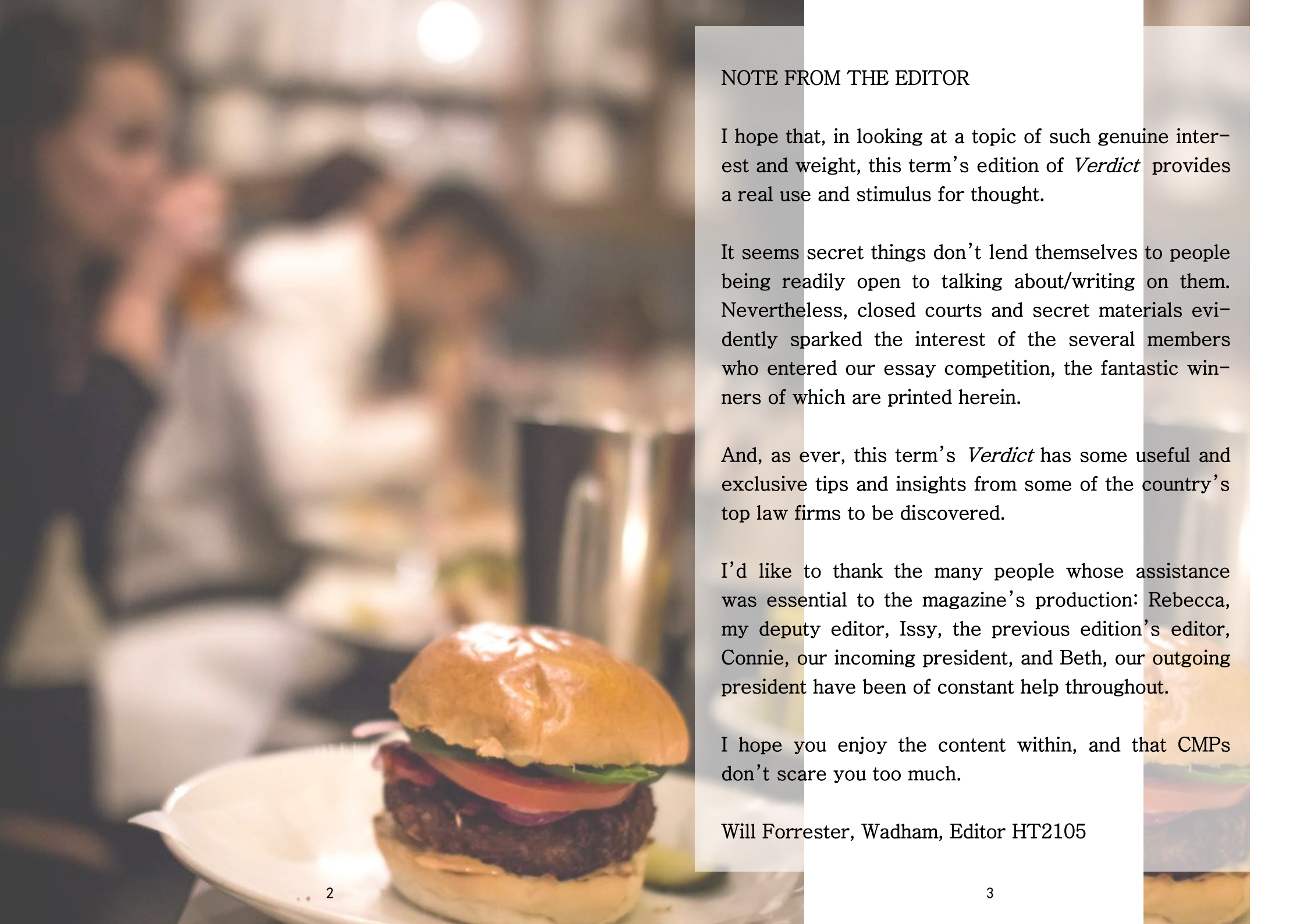




C O N T E N T S

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NOTE FROM THE EDITOR

I hope that, in looking at a topic of such genuine interest and weight, this term's edition of *Verdict* provides a real use and stimulus for thought.

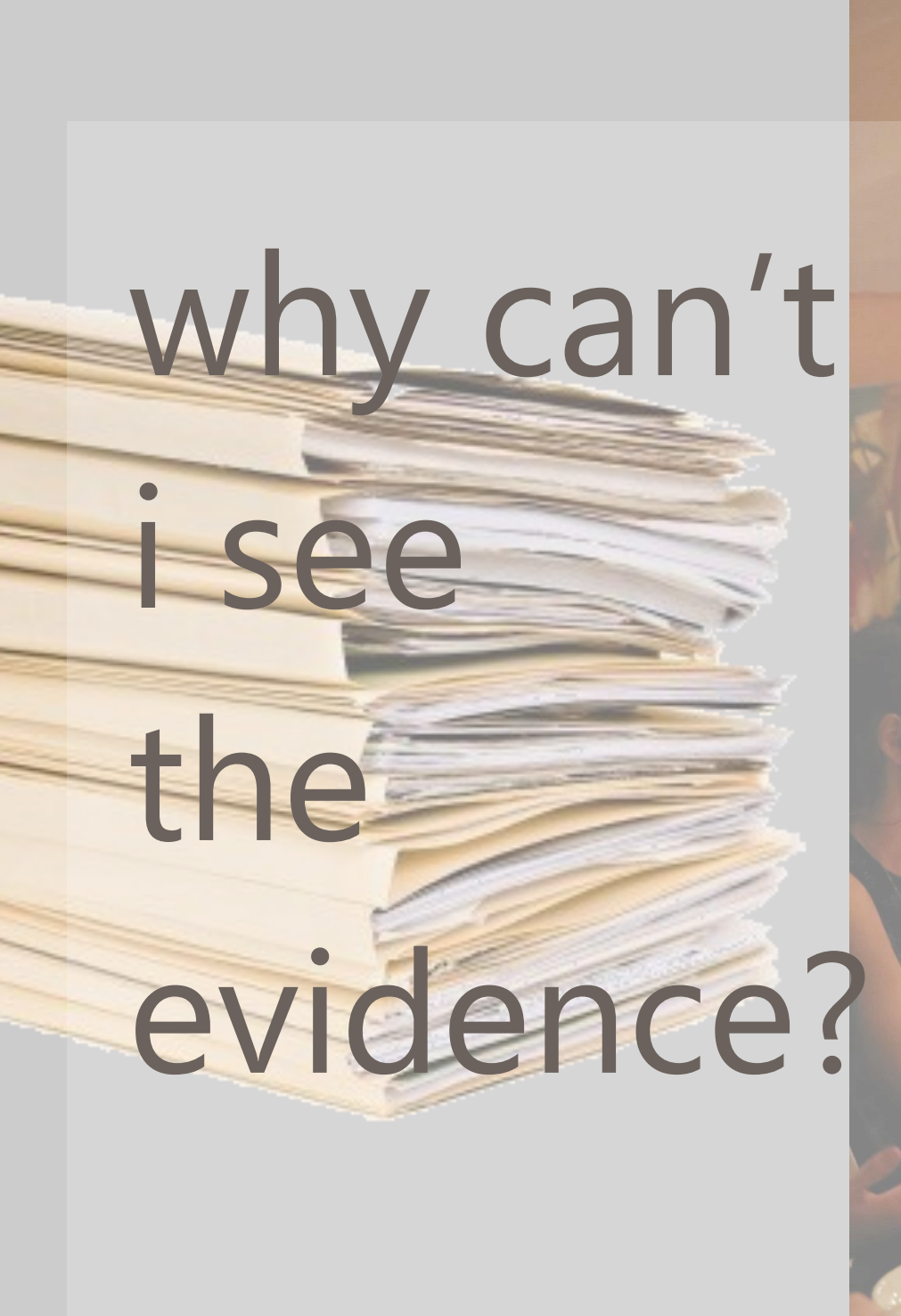
It seems secret things don't lend themselves to people being readily open to talking about/writing on them. Nevertheless, closed courts and secret materials evidently sparked the interest of the several members who entered our essay competition, the fantastic winners of which are printed herein.

And, as ever, this term's *Verdict* has some useful and exclusive tips and insights from some of the country's top law firms to be discovered.

I'd like to thank the many people whose assistance was essential to the magazine's production: Rebecca, my deputy editor, Issy, the previous edition's editor, Connie, our incoming president, and Beth, our outgoing president have been of constant help throughout.

I hope you enjoy the content within, and that CMPs don't scare you too much.

Will Forrester, Wadham, Editor HT2105



why can't
i see
the
evidence?

When you are before a court – in either criminal or civil proceedings – you may see and challenge the other side's evidence; this (ostensibly) is a foundational principle of the administration of justice. The legal process and its outcomes are thus subject to observation and scrutiny on multiple levels – the room, the public, the Press. On 25 April 2013, the Justice and Security Act was passed with parliamentary approval. The Act sanctioned the extension of closed material procedures into main civil courts. Under such procedure, the court hearing is divided into "open" and "closed" sessions with "open" and "closed" judgments. "Sensitive material" – that is 'material the disclosure of which would be damaging to the interests of national security' – may be introduced to the case by the government, but will only be seen by the judge and a security-cleared, Attorney-General-appointed "special advocate", who represents the interests of the claimant or defendant. At most, a party may receive a terse summary from this special advocate, and been prevented from communicating with them thereafter. Therefore, the public, the Press, the claimant/defendant's own lawyer, and the individual themselves may not be aware of the allegations being made against them. Defenders of the Act argue that it is "in the public interest", and indeed the interest of the administration of justice, that material pertinent to national security remain undisclosed to that selfsame interested public. Critics, conversely, argue that material nondisclosure biases the case towards government – whether they are accuser or accused – and therefore stands diametrically to the right to a fair trial.

On 12 February of this year, the Counter-Terrorism and Security Act 2015 received Royal Assent. The Act has interesting implications as to CMPs and secret hearings: it means that the deprivation of citizenship of a terror suspect may be applied retrospectively, and on the basis of closed material. Further, the act makes no provision of special advocates or brief summary for the defendant and their lawyers.

Were CMPs unprecedented?

Closed material procedures predated the 2013 Act in a form: special immigration cases, employment tribunals, and the investigatory powers tribunal (that handles complaints against intelligence services) have, to varying extents, used a similar argument for concealing material for "the public interest". The contention of the Act is that it extends the use of such procedures into civil courts, where their invocation owing to sensitive material might render allegations *against* the state of, say, rendition and torture to be hidden from the public domain.

Has the 2013 Act meant more or less intelligence-related cases?

As the Act was under discussion, Ken Clark (then the cabinet minister without portfolio) said that, because previously the state settled and paid compensation over such cases as they could not disclose evidence in court, CMPs would in fact mean *more* intelligence-related cases being brought. In the first year of their enablement (from June 25 2013 to June 24 2014), there were five instances where CMPs were sought, and two instances where this was granted (with the others, at the time of the Secretary of State's report, remaining in review). Of these two, one case reached an open final judgment, the other a closed one. There are five readily identifiable cases that would demand a CMP – and, indeed, four of these have judgments that openly say an application was made. It is worth noting that each of these cases were instances of individuals or groups claiming *against* the state – not quite the Kafka-esque visages of bewildered defendants that might at first be summoned by the Act. Notwithstanding, the closed nature of these cases, where the public is obfuscated from

accusations against the government and where the state chooses the special advocates who may give the opposed claimants a mere gist of pertinent "secret materials", seems obstructive of both those phrases repeated so frequently in the Act and by its defenders: "in the public interest", and "the fair and effective administration of justice". Indeed, the fact that (despite several attempts) the details of the Secretary of State's reports may not easily be married up with the five cases that ostensibly would have called for CMPs is indicative of the public's inability to identify and evaluate the types of occasions in which CPMs are being sought.

Are CMPs *permanently* secret?

Despite Governmental opposition, a House of Lords amendment to the 2013 Act means that the need for material to be "closed" must remain under review by the court that sanctions it, and may be revoked at any point if 'it is no longer in the interests of fair and effective administration of justice'. Indeed, the fact that "the fair and effective administration of justice" is the phrase used by the Act both for the triggering and cessation of CMPs is symptomatic of the dialectic discussed in our essay competition: national security and an open, scrutable trail are both "in the public interest" – how, then, can they coexist in intelligence-related cases?

APPLICATION TIPS

Competition for vacation schemes and training contract places is fierce. So how you communicate your ideas on paper and in person will be important. So ask yourself the following questions before you apply to firms: Do you really have an interest in the global business world? Do you want to work for global clients? Are you flexible about your work patterns and also your location? Are you excited about the stories you read about in the press? This should help you to make the right decisions about the types of firms you apply to and focus your research.

Here is how to make the most of your application once you have decided to apply:

- Take the time to read the form thoroughly to understand what each question is asking. Draft your answers carefully before submitting them in your completed application.
- Make a list of the key skills and competencies you think are essential for being a successful trainee lawyer.
- Be clear about why you have chosen us and why you see your future here.
- Be interesting and engaging. We value individuality, so make sure that your personality, passions and interests come across.

INTERVIEW AND APPLICATION ADVICE FROM NORTON ROSE FULBRIGHT

Attention to detail and clarity of thought are non-negotiable. Remember to check and double-check all spelling and grammar. Express yourself concisely and clearly - and don't use jargon.

- Do not be afraid to sell yourself. That is what the process is all about. Demonstrate how your interests and experience are relevant to the role and why they make you our ideal candidate.
- Include examples of any work placements or experience you feel are relevant. So long as you can demonstrate that they are, we will want to know about it. Pay particular attention to activities that show you have commercial awareness and excellent communication skills.
- Tell us about your research. If you have undertaken a legal placement or attended a careers fair or open day, this will underline your commitment to your future career.
- We are interested in hearing your opinions about us. Make sure these are well informed. We don't want to hear quotes from our own materials.

Be honest and straightforward. Keep a copy of your completed application, as we will ask you about your answers during your interview.

INTERVIEW TIPS

Training to be a lawyer at a top commercial law firm involves just that - training. The LPC and the training contract itself will expose you to commercial topics and teach you how to be an excellent lawyer. And we know this. At interview, remember that we are looking for your potential to develop into an excellent lawyer and also evidence of a genuine interest in business. We don't expect you to know everything already.

Here are some key points to remember:

- Prepare thoroughly. Show you are well informed about us by displaying your knowledge of our global reach, our strategy and our work.
- Demonstrate your grasp of topical commercial issues and developments, so read the business and legal press.
- We want to get to know you. So be prepared to do about 80% of the talking - but don't waffle. Keep what you tell us pertinent and succinct.

- Draw parallels between your knowledge and experience and what you believe your role, as a trainee lawyer will involve. Give concrete examples.

- Think about the information you want to convey during the interview and find a way to make sure we know all that we need to.

- Look and act the part. The majority of communication is non-verbal. Projecting confidence inspires confidence. And, remember, first impressions last, so be sure to start with a firm handshake and maintain eye contact with your interviewer.

- Don't rush to give an answer if you think the question requires more thought. Ask for the time to consider if you need to.

Show interest. Ask questions. We like enquiring minds. But take care not to ask things that are readily available in the public domain and should have been covered in your research.

ESSAY COMPETITION

Each term, *Verdict* runs an essay competition on the theme of the issue, with a cash prize. Printed here are the winner and runner up. Thank you to everyone who entered! The title was: “Are closed material procedures – so-called “Secret Courts” – a national security necessity or a threat to fundamental legal liberty?”

RUNNER UP: Finn Clark

Introduction

In this essay, I will argue that Closed Material Procedures (referred to hereafter as ‘CMPs’) are, by their nature, a threat to legal liberty that is immanently warranted by human dignity and the rule of law. Further, their necessity in relation to the normative goals of protection of citizens and national security is suspect. Other measures can perform similar functions without necessitating abrogation of such fundamental freedoms. The framework I will employ in order to test these theses will borrow from that adopted by domestic courts in assessing ‘proportionality’ in relation to human rights breaches, namely Lord Bingham’s statement in *Huang v Secretary of State for the Home Department*.

Framework of enquiry

Lord Bingham advances four criteria in *Huang* purportedly formulating a comprehensive statement of the proportionality test in law. Proportionality is the judicial enquiry that asks whether a human rights breach perpetrated by the executive is justified by its protection of an important competing objective, such as national security, before asking whether that objective might be achieved in a less pernicious manner. Once establishing that there has been a human rights breach (which will be done shortly), we must ask ourselves four questions:

- 1) is the legislative objective sufficiently important to justify limiting a fundamental right?;
- 2) are the measures which have been designed to meet it rationally connected to it?;
- 3) are they no more than are necessary to accomplish it?; and
- 4) do they strike a fair balance between the rights of the individual and the interests of the community?

These four questions will form the skeleton of the argument in this essay. It should be noted, however, that they will not be answered in the sense that Lord Bingham and other members of the judiciary

Might answer them. The juridical concept of deference to executive decision-making is justified by proper separation of powers, but this does not prevent us normatively assessing CMPs from a more objective standpoint. In a strict legal sense, the proportionality test pertains only to executive and not legislative power. All the framework does is afford us a valuable structure, and this will not preclude full critical analysis of the justification and efficacy of CMPs.

Do CMPs represent a human rights breach when practiced?

Yes. CMPs necessarily breach both European Convention rights and rights that generally are considered to exist outside of the substantive law. Article 6 of the European Convention of Human Rights explicitly requires a 'fair and public hearing', and the right to a fair trial has been doctrinally enshrined in UK common law jurisprudence since (at least) the establishment of Habeas Corpus.

Is the legislative objective sufficiently important to justify limiting a fundamental right?

This question cannot be addressed so swiftly. There is a multiplicity of legislative objectives underlying the *Justice and Security Act 2013* and CMPs. The foremost one can perhaps be articulated in terms of national security – it is seen as imperative that sensitive material, release of which could threaten lives of British citizens, is not available within the public domain, and, further, it is particularly important that those accused of committing (at least preparatory) terrorist acts do not gain access to material that could compromise security service sources.

On the flipside, the value of the 'fundamental right' in question cannot be overstated. The right to a fair trial has irrefutable value for three distinct reasons. Firstly, and quite simply, human dignity requires a base level of comprehension of what one is accused of in order to understand the gravity of coercion and of accusation that will or may be applied. Secondly, it is a necessary requisite of the rule of law; it is an invaluable check on arbitrary power that justice is seen to be done publicly. Thirdly, and relatedly, a fair trial is critical in ensuring the accuracy of judicial decisions. If the accused cannot inform their lawyer of their alibi, or of their simple explanation for some seemingly incriminating evidence, then how can the courts be sure that their (likely heavily coercive) decision is the correct one?

However, for the purposes of this essay, no conclusive judgments will be made on this issue. We will assume that the objective stated above is a justified one. Nonetheless, it will be shown that *even if* we accept this legislative goal as justified, the measures used to vindicate it cannot be said to be a 'national security necessity'.

Are the measures which have been designed to meet it rationally connected to it?

This is self-evident. In order to address the problem of national security secrets being leaked into the public domain, some court hearings are undertaken in private.

Are the measures no more than is necessary to accomplish the legislative objective?

It is submitted that the answer is no. The legislative provisions are far too broad and ambiguous required in order for these provisions to abrogate from fundamental rights to the minimum possible extent. Two sections of the 2013 Act spring to mind in particular. Firstly, and most importantly, Section 6 of the Act dictates that all is required before a court can declare that a case requires the application of closed material procedure is that 'a party to the proceedings would be required to disclose *sensitive material*' (my emphasis). The justification for the provisions given above centred mainly on the release of information to the accused such that field-agents of the security services and the like would not be compromised. There is no evidence, nor any logical indicators, that would suggest that all 'sensitive' materials facing a court compromise national securities concerns at all, nor is any guidance as to what this term means. The second difficulty follows from the first; Section 12 provides for insufficient inter-institutional supervision of these judicial decisions. Given that no one knows what these terms mean, courts will have the discretion to apply them in an inconsistent and therefore unfair manner. Yet the Home Secretary is in charge of reviewing usage of the procedure: the Home Secretary's responsibilities include prevention of crime, and protection of national security. They do not expressly include considerations of human rights. The Home Secretary is accountable only to electorate, who, for obvious reasons, have no idea as to whether she is performing her job well. This is plainly dissatisfactory, as well as unnecessary. Recourse to independent analysts, extricated from executive functions but with expertise on

these matters, would be preferable. Moreover, recourse to the supervisory jurisdiction of the appellate courts, beyond the restricted *AF* and *Bank Mellat*, would be undoubtedly preferable to the current arrangement.

Conclusion

It is unnecessary to consider Lord Bingham's fourth criterion of human rights proportionality, since we have shown the legislative abrogation of rights in question to be an unjustified and unnecessary means of achieving that end. Even if the face of the rather idiosyncratic security problem that terrorism presents for states, the means of tackling the problem do not, by necessity, extend to 'sensitive material' being excluded from public discourse by that mere fact alone. The value of the right to a fair hearing warrants more careful legislative consideration. Therefore we have shown that, as they stand, CMPs are not a 'national security necessity', and, therefore, they do represent a threat to 'fundamental legal liberty'.

WINNER: Jocelyn Teo

"You can't go away when you're under arrest."

"And why am I under arrest?" Kafka then asked.

"That's something we're not allowed to tell you. Go into your room and wait there. Proceedings are underway and you'll learn about everything all in good time."

-Franz Kafka,
The Trial

Closed material procedures (CMP) are proceedings where the Government may present secret material to the courts, while the other party "may be excluded, with secret defences they cannot see, secret evidence they cannot challenge, and secret judgments withheld from them and from the public for all time". CMP

were initially reserved for immigration cases involving suspected terrorists, but have since been extended to all civil proceedings by the Justice and Security Act (JSA) 2013. The Government's strongest justifications for CMP are national security and the enablement of the courts to consider all relevant material. However, this essay argues that the present CMP regime is too wide, and poses a threat to fundamental legal liberty for three reasons: first, it infringes the principles of open justice and natural justice, second, the supposed safeguards are inadequate, and third, it undermines public confidence in the courts and their role in the determination of truth.

National Security Necessity?

The strongest argument in favour of CMP is the public interest in national security, the UK's international relations, and the detection and prevention of crime. In *Carnduff v Rock*, the claimant, a registered police informer, brought an action against the police to recover payment for information and assistance provided to the police. The Court of Appeal struck out the claim on the grounds that it was contrary to public policy, as it would necessitate disclosure of police operational information and undermine the effectiveness of the police force in detecting and preventing crime. Jonathan Parker LJ reasoned that 'if a fair trial of the issues would necessarily involve the disclosure by the authorities of information or material which is sensitive or confidential and the disclosure of which is not in the public interest...then the case should not be allowed to proceed' and the court may strike the action out. Moreover, Laws LJ cautioned that to hold otherwise would mean that the police would be forced into 'holding up its hands' and 'making comprehensive admissions' to avoid disclosing the evidence.

With respect, this reasoning places too much emphasis on the protection of proper functioning of the police force, at the expense of injustice to the claimant. If it would be unjust to force the police to make admissions to avoid disclosing the evidence, it follows that it would be equally, if not more, unjust, to force the claimant to abandon its claim. As Zuckerman has argued, the CA's decision to strike out the claim has thus denied the claimant a fair trial. Another justification for CMP put forward by the Government is that it was fairer than the existing public interest immunity (PII) system. Where a PII claim has been upheld, the material is completely excluded from the proceedings. The JSA Green Paper argues that the exclusion of key materials means that the 'case cannot always be contested fairly for both sides'. By contrast, CMP allows the court to consider all the relevant material, and a judgment based on the full facts is more likely to secure justice than a judgment based only on a proportion of the relevant material.

However, this justification is flawed for three reasons. First, as Lord Kerr explained when rejecting this argument in *Al-Rawi v The Security Service*, it was a 'fallacy...that because judge sees everything, he is bound to be in a better position

to reach a fair result. To be truly valuable, evidence must be capable of withstanding challenge. Evidence which has been insulated from challenge may positively mislead. Second, as Craig has argued, PII developed from the common law out of principles of fairness and equality of arms. CMP, by handing over to one party considerable control over the production of relevant material and the manner in which it is to be presented, does not make the process fairer than PII, but instead poses a threat to the principles of fair trial and equality of arms. Third, as Zuckerman has argued, CMP undermines the dignity of the excluded party, because a person whose fate is decided behind closed doors without having a meaningful opportunity to participate in the process is treated as one treats persons who lack the mental capacity to make a rational contribution to the decision-making process. Thus, CMP should not be a national security necessity, but should be considered only as a last resort. Instead, the *Wiley* balancing exercise between the public interests in national security and in open justice conducted in PII claims, coupled with disclosure of summaries or redacted documents, should be preferred.

Threat to Fundamental Legal Liberty

First, CMP threatens common law fundamental principles of open justice and respect for principles of natural justice. As Lord Kerr in highlighted in *Al-Rawi*, it was precisely because of the risk that evidence insulated from challenge became misleading ‘that the right to know the case that one’s opponent makes and to have the opportunity to challenge it occupies such a central place in the concept of a fair trial’.

Second, the supposed safeguards to ameliorate the effect of CMP on open justice and natural justice are inadequate. In *Al-Rawi*, which concerned allegations of complicity, torture and the like by the UK Intelligence Services abroad, the government argued that the involvement of special advocates (SA) remedied the defects of CMP. SA are lawyers cleared by the government to see closed material, appointed by the Attorney General in cases where CMP is invoked, and represent the interests of the excluded party. However, as Chamberlain, a SA, has argued, the protection afforded by SAs is inadequate, because they are hampered by their inability to take instructions from the party whose interests they were required to represent after having seen the closed

material, appointed by the Attorney General in cases where CMP is invoked, and represent the interests of the excluded party. However, as Chamberlain, a SA, has argued, the protection afforded by SAs is inadequate, because they are hampered by their inability to take instructions from the party whose interests they were required to represent after having seen the closed material. Moreover, Lord Dyson in *Al-Rawi* was sceptical of the government’s argument, highlighting that this problem was exacerbated by the fact that judges would be unable to determine if and to what extent the SA’s ability had been so hampered.

Third, CMP undermines public confidence in the courts and their role in truth determination. As Lord Neuberger MR held in *Al-Rawi*, ‘if the court was to conclude after a hearing, much of which had been in closed session, attended by the defendants, but not the claimants or public, that for reasons, some of which were to be found in closed judgments that was available to the defendants, but not to the claimants or public, that the claims should be dismissed, there is a substantial risk that the defendants would not be vindicated and that justice would not be seen to have been done.’ Moreover, as argued above, the untested evidence provided by the government may potentially be misleading and impede the court’s role in the determination of truth.

In conclusion, while national security threats are a valid concern, CMP as currently implemented may not be the best way to balance them against the public interest in open justice. Instead, PII, which incorporates the *Wiley* balancing test, should be made a compulsory precursor, and CMP should only be considered as a last resort. Moreover, the use of summaries and redacted documents would involve a smaller incursion into the other party’s right to know the case made against them, avoid Kafka-esque trials, and prevent CMP from threatening fundamental legal liberty.

7.45am: After getting on a train to the office, my day normally begins with a quick trip to the in-house gym, where I will go for a run or join a spin class. It's a great way of clearing my head in the morning before settling down to work.

9.15am: I grab a coffee and some breakfast from the staff cafeteria to take to my desk, and log into my computer to begin the day's work. Overnight, I will have received emails with legal updates, news headlines that are relevant to my department's work, and developments in the project I am working on which I catch up on before discussing with my supervisor the tasks for the day.

9.30am: I am working on a regulatory investigation with a very high profile client, a huge project that involves 50 lawyers on both sides of the Atlantic. A great deal of project management is required, which trainees are often involved with. We have a weekly call with the client, and one of my regular jobs is to liaise with the various teams in London, Washington and New York to update the agenda for the call with all the developments in the project that have occurred in the past week.

11.00am: An urgent email arrives and the partner on the case asks for a quick response to a complicated question he has in advance of a lunchtime meeting with the client. It's all hands on deck as everyone drops what they were doing to assist in finding the answer as soon as possible.

A DAY IN
THE LIFE OF
A
HOGAN LOVELLS
TRAINEE
ANAAR PATEL
GEOGRAPHY, HERTFORD, OXFORD
CORPORATE, and FINANCIAL
LITIGATION

11.30pm: The tasks I am being given for the day are piling up, and after assessing my deadlines I have a chat with my supervisor to confirm my work priorities for the afternoon. One of the major skills you need to develop as a trainee is the ability to organise your time and make informed judgments about priorities so that you can manage your capacity and make deadlines.

12:45pm: I pop out to the food market on Leather Lane to pick up lunch, which I eat in the staff cafeteria with some other trainees.

1.30pm: The afternoon is spent on a series of weekly calls to keep those involved in the project abreast of developments. We speak to our American counterparts at Hogan Lovells and we have a long call with the client to update them on the investigation. My task is to take a comprehensive note of the discussions, which I then type up and circulate to all involved.

4.30pm: There's a birthday in the department, and it is customary to provide cake for everyone. After a tea and cake break, I spend the afternoon reading up on the background and finalising the documents that will be required for an interview with a witness that I am attending the next day.

7.30pm: Once all the documents and the interview room are prepared and I am sufficiently up to speed, I ask my supervisor if there is any more work she'd like me to help with tonight. She tells me that there is not, so I join some of the trainees at a nearby pub for drinks.

BETH GREGORY



PRESIDENT

CHLOE HALL



TREASURER

PHOEBE WHITELAW



V P

ELLIE THORNHILL



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tary**

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**Ball and Social Secre-
tary**

Louie Mackee



H I G H L I G H T S

TREASURER

Law Soc's Hilary has had—despite being the tricky middle term—an amazing selection of social and informative events, and we've worked hard to find the sponsorship that makes these events possible. It's been great to be part of a team that has achieved so much, and I'd like to thank all the executive—Beth, Phoebe and Ellie—for the wonderful work they've done; without each other's efforts none of us would have been able to achieve all that we have this term. I'd finally like to wish George, the incoming treasurer, and all the rest of committee good luck for Trinity, I'm sure they'll do an amazing job, and hope they enjoy their time as much as we did.

Chloe

OUTGOING EXECUTIVE

VICE-PRESIDENT

As vice-president my role officially is to "assist the president" so a lot of my work this term has been the same as the other exec: emailing firms for sponsorship, arranging presentations, sorting through applicants for events and organising the ball. I have been in charge of coordinating our new website which by the time you are reading this should be up and running! I've really enjoyed my time in Law Soc – sometimes things can get a bit stressful, but it's always been well worth it. I'd like to wish Issy and the rest of the incoming executive team good luck, and I'm sure they'll do a great job!

Phoebe

P R E S I D E N T

I have now been on Committee for three terms and have thoroughly enjoyed my time. Being President gives you an insight into both the Society and the sponsoring firms. It's been tough at times, with multiple firms emailing at once and events on concurrent days, but it's definitely been worth it. I've been able to understand the firms much better and to hopefully organise events which have helped others to. For me, Law Soc is essential for those interested in law for two reasons; not only does it provide incredible opportunities to network with representatives from a range of backgrounds, but it provides opportunities to moot and write legal essays regardless of your degree background or year group

I was elected as President at the end of Trinity term, but my work really began in Michaelmas. The role of President mostly involves liaising with firms to organise sponsorship and supporting the other committee members in their respective roles, such as mooting or pro bono. As well as the usual duties, we have been creating a website, the responsibility for which I have been able to delegate to Phoebe, my Vice President. I've also been discussing with firms and other societies a possible pro bono section of Law Soc, which our Pro Bono Secretaries have been working hard to create.

Each member of the Executive Committee becomes a contact for each of the firms. After a flood of emails and phone calls with a variety of firms, we began to organise this term's events. A new idea this for Hilary was Burgers & Milkshakes, which was sponsored by one of my firms. President's Drinks was the first large event of the term, and although there were a few hiccups throughout the day, the evening was spectacular. My favourite part of being President has been the organisation of the termly Ball. The preparations started back in Michaelmas, in which we chose and organised the Thames boat drinks reception, and secured the Old Royal Naval College as our venue. There was then a final rush at the end of the term to finalise all of the details, and hopefully, by the time you're reading this, you will have had the chance to experience and (fingers crossed) enjoyed the Ball as much as I enjoyed organising it. Being President may be stressful at times, and there is a lot of administrative work that goes on behind the scenes, but it's all worth it! The events could not have been organised without the help of all the members of committee, who have been fantastic this term. I'd like to extend particular thanks to the rest of Executive – Phoebe, Chloe and Ellie – for all their wonderful work throughout Hilary, and, finally, to wish Connie, George and Issy the best of luck for Trinity.